

Proposal

Changes to possum control in Hawke's Bay?

A partial review of
the Regional Pest
Management Plan

Changes to possum control in Hawke's Bay?

Summary

Hawkes Bay Regional Council is undertaking a review of the Regional Pest Management Plan (RPMP 2019) to include proposed changes to the way that Possum Control Areas (PCA) are managed. We propose to transition the current PCA programme from land occupier responsibility to the use of contractors instead. This proposal is only about possum control, all other pest management programmes are unaffected while this proposal is being considered.

Key points:

- The PCA programme is a significant regional biosecurity programme that delivers a range of benefits particularly for biodiversity.
- Biodiversity benefits include an increase in Tui, Bellbird and Kereru numbers, as well as preventing the spread of TB (possums are a vector).
- Implementation to a contractor based model will occur in 2024.

What is the process from here?

1 July 2022	Consultation opens
31 July 2022	Consultation closes
17 August	Hearing for submitters to present their views in person
28 September	Decision made by HBRC

What happens next?

If the proposal is adopted, the aim is to transition the updated PCA programme in 2024 from land occupier responsibility to contractor managed by HBRC. The existing land occupier responsibility regulations remain while that transition occurs, until contractor-based control is in place in each area.

Reasons for the proposed changes

Challenges with the current model

The current land occupier responsibility model for possum control is harder to manage than using contractors. There are many more occupiers potentially doing control on their own properties than the number of contractors it would take to control possums effectively at a landscape scale.

One 3,000 hectare PCA in Hawke's Bay has 133 properties, while the average per PCA is about 50 properties. To ensure that control is done in the right way at the right time, large numbers of small properties introduce considerable uncertainty into the system. There are about 4,300 properties in the current PCA programme¹. Monitoring the performance of each property is a daunting prospect if each does their own possum control. Three to five contractors could cover 400,000 hectares, dramatically reducing performance monitoring costs.

For most landowners, possum control is just one of many jobs to be done on a property. Even with the best of intentions, some owners will do possum control haphazardly or not at all. Contractors will be more singularly focused on meeting their performance targets to get paid. This does not reflect badly on farmers. It simply acknowledges the reality for anyone whose primary business is not possum control.

The Regional Council estimates that 70% of current PCA properties do their own possum control. However, Council analysis also suggests that about 50% of those occupiers are likely doing little or no control.

Internal analysis by HBRC staff in 2016 looked at the total volume of toxin recorded as part of the subsidy scheme. Staff then took a conservative approach to calculate how much bait would theoretically be applied by landowners doing control themselves. For the 2015-16 financial year, 247,615 hectares was nominally under control by occupiers. However, only about 31,000 ha would have been covered with the bait sourced through the subsidy scheme, suggesting that 216,000 ha went uncontrolled, or 54% of the total PCA sample area.

These figures are supported by reports from HBRC staff and contractors, who note significant anecdotal evidence of landowners not undertaking regular possum control.

¹Excluding PCAs that have gone back to OSPRI.



Other challenges

Monitoring

The land occupier responsibility model also undermines the effectiveness of the Council's compliance monitoring programme. There is no accepted and practical monitoring protocol for properties 4 hectares in size and smaller. In practice, properties of 20 ha or less are challenging to monitor, due to requiring a set-back from property boundaries. In short, there is not enough area on small properties to place possum monitoring lines effectively. As a result, the Council cannot easily assess those occupiers' compliance with RPMP requirements, even though those properties may have large possum populations.

The current monitoring programme was designed to assess individual land occupier compliance, rather than confirm possum levels across an entire PCA. Over the last five years, on average 9% of the total PCA area was monitored for possum numbers yearly. The annual figure varies depending on the budget available. For example, in 2015-16 it was 14%, while 2017-18 was 5%.

The degree of compliance also varies by year. Over the five years from 2015-16 to 2019-20, an average of 15% of monitored properties did not comply with the RPMP requirement.

Overall, the Council believes that the current monitoring programme does not enable region-wide conclusions about the effectiveness of possum control with a high degree of confidence. Changing to a landscape scale, contractor-based approach will provide much greater certainty that possum numbers are being kept low across all operational areas.

Brodifacoum

Linked to the land occupier responsibility model is the associated and widespread use of brodifacoum – an effective, relatively inexpensive, and widely available toxin. Brodifacoum is the primary toxin used for ongoing possum control nationwide, despite its known ability to impact native and introduced non-target wildlife². A formal reassessment of the regulatory status of brodifacoum is under way³ and could well lead to restrictions on its public use. One of the main drivers of this reassessment is the risk of brodifacoum being consumed by stock destined for human consumption⁴.

If, as expected, brodifacoum use is restricted in the future, it is likely that many landowners will be put off by the additional requirements, further complicating the current model of possum control.

In contrast, contractors with Controlled Substance Licences (CSL) can use a wider range of toxins than farmers and other members of the public. This allows the best tool to be used for each site, following best practice. This includes removing old bait and making sure stock cannot access bait.

² *Environmental fate and residual persistence of brodifacoum in wildlife*, prepared for Hawke's Bay Regional Council, envirolink.govt.nz/assets/Envirolink/884-HBRC131-Environmental-fate-of-brodifacoum-in-wildlife.pdf

³ mpi.govt.nz/dmsdocument/33439/direct

⁴ MPI presentation to the Regional Council Biosecurity Working Group.



There is clear evidence from research over the last 20 years that possum control provides significant biodiversity benefits.

Improvements to native biodiversity

The Regional Council believes that the changes proposed to the possum management programme in the RPMP will do more to protect and restore native biodiversity. In doing so, this proposal will support the HBRC Strategic Plan adopted in June 2020. One of that plan's four key priority areas is "healthy, functioning and climate-resilient biodiversity." Implementation includes scaling-up biodiversity protection by using new technologies and techniques, including pest control operations.

There is clear evidence from research over the last 20 years that possum control provides significant biodiversity benefits. One report, "A review of biodiversity outcomes from possum-focused pest control in New Zealand" is a meta-analysis of 47 research projects and one of the largest studies of quantitative data to date on the biodiversity benefits of possum control.

The report found:

- 85% of studies reported a positive response of vegetation after possum control
- 80% of the relevant studies showed that native birds did better and were more abundant after possum control.

Possum control even helps restore native bird life in our cities and towns. Following the possum control which began in Napier in 2008, bellbird numbers doubled after one year. After five years, bellbird numbers trebled, and tui quadrupled⁵. Napier also saw the first evidence of kereru breeding in 30 years.

A shift to using professional contractors will ensure that possum control in the Hawke's Bay is of a reliably high standard, with positive flow-on benefits for biodiversity around the region .

Council managed possum contracting is also a potential foundation to the region's efforts to become predator free. Possums are the most likely of the Predator Free 2050 species to be the target of eradication across the New Zealand mainland. The use of professional contractors, the latest pest control tools and techniques and the ability to record a detailed range of information related to pest management programmes all create a greater opportunity to progress from possum suppression to possum eradication across the region.

⁵National population trends for tui and bellbird were stable for this period.

Relationship of this proposal to other strategies and plans

Relationship to other pest management plans

This proposal does not involve any change to the relationship between the RPMP and any other pest management plan.

The Hawke’s Bay region shares a boundary with Gisborne District Council, Bay of Plenty Regional Council, Waikato Regional Council and Horizons Regional Council. Several of these councils already use contractors for possum control. The council will coordinate its work programmes with neighbouring regional councils where practical to maximise efficiencies in possum control .



Relationship with the national policy direction

The National Policy Direction (NPD) for Pest Management sets out requirements for developing pest management plans and programmes under the Biosecurity Act 1993.

HBRC has followed the guidance included in the NPD to assess the level of analysis of costs and benefits needed for this proposal. That assessment concluded that a high level of analysis is appropriate, and is available online with this proposal. The subsequent cost benefit analysis is also online.

The National Policy Direction also requires an assessment of the risk that options being considered will not achieve the objectives, also available online.

There is a relatively high risk the existing possum control programme will not deliver on its objectives over the longer term. The gradual shift to using professional contractors will reduce that risk significantly.

The NPD also requires an assessment of any proposal Good Neighbour Rule. The GNR in this proposal is unchanged from that included in the current NPD.

HBRC has taken these steps to comply with the NPD.

NPD requirements	Steps taken to comply
Programme is described	The types of programmes comply with clause 4 of the NPD
Objectives are set	The contents of section 6 comply with clause 5 of the NPD
Benefits and costs are analysed	The cost and benefit analysis is online (see clause 6 of the NPD)
Funding rationale is noted	The funding rationale has been developed in line with clause 7 of the NPD
Good neighbour rules (GNRs) are described	GNRs have been developed in line with clause 8 of the NPD

Relationship to HBRC strategies, policies and plans

The possum management programme at the heart of this proposal sits in a biosecurity framework for the Hawke's Bay region. This includes the RPMP, the Hawke's Bay Biodiversity Strategy and the HBRC Strategic Plan.

Failing to achieve the RPMP objective and Council's Level of Service Measures for the PCA programme is a risk under the current land occupier model. This could jeopardise the strategic outcomes and goals in the HBRC Strategic Plan 2020-25 for Biodiversity and Land.

The basic purpose of the Regional Pest Management Plan is to:

- minimise the actual or potential adverse effects from pests
- maximise the effectiveness of individual actions in managing pests through a regionally coordinated approach.

The Council believes that those purposes will be met more effectively through the proposed changes to the possum control programme.

The proposed changes also support the Regional Policy Statement (RPS) and Regional Biodiversity Strategy.

Section 3.4 of the RPS concerns Indigenous Vegetation and Wetlands. Objective 15 seeks to preserve and enhance remaining areas of significant indigenous vegetation, significant habitats of indigenous fauna and ecologically significant wetlands. Policies under this objective promote using regulatory and non-regulatory methods to protect significant indigenous vegetation, particularly wetlands. The Council believes that a more effective possum control programme will advance these objectives.

The Regional Biodiversity Strategy emphasises the threat to native biodiversity from introduced animals such as possums, rats, stoats and cats. We expect that changes to the possum control programme will achieve better biodiversity outcomes by creating greater certainty that possum numbers will be kept low for longer.

Aspects of the Regional Biodiversity Strategy have been incorporated into the HBRC Strategic Plan adopted in June 2020, with biodiversity as one of its four key pillars. The Council is undertaking a

series of initiatives to improve the effectiveness of our pest control operations to enhance biodiversity.

The Council is satisfied that the proposal is not inconsistent with any regulations.

Relationship with Māori

The proposal does not involve any change to the relationship between the Regional Pest Management plan and Māori.

The Council believes that the amended RPMP will continue to provide for the protection of the relationship between Māori and their ancestral lands, waters, sites, wāhi tapu, and taonga through the protection of those aspects from the adverse effects of pests.

The Council is committed to meeting all of its partnership obligations in implementing the RPMP.

Consultation

Some preliminary consultation on this proposal has already occurred. Discussions with key stakeholders are planned for the near future, in addition to the formal consultation required by the Biosecurity Act.

Details of proposed amendments to the RPMP

The adverse effects of possums are well known and remain unchanged from the current RPMP. The proposed changes to the RPMP would shift possum control from an occupier response model to a landscape-scale contract model. The intent behind proposing a new delivery method for possum control is to create a more cost-efficient and effective programme to achieve the outcomes in the Regional Pest Management Plan.

The fundamental change proposed here is to gradually remove the obligation on land occupiers to control possums in designated possum control areas (PCA).



Background

The Hawke's Bay region covers approximately 1.4 million hectares, of which approximately 935,000 ha are appropriate and practical to include in the Regional Council's possum control area⁶. The current PCA programme encompasses about 750,000 ha. Another 185,000 ha are under possum control managed by OSPRI.

Land occupiers in the current PCAs are required to control possums either through their own efforts or engaging a contractor.

Transition

Under this proposal, all possum control would eventually be carried out by contractors engaged by Hawke's Bay Regional Council. However, that change will occur gradually over four to five years. The changes in this proposal allow for a transition period during which land occupiers remain responsible for possum control until the Council has engaged contractors to do the work in their areas.

Until a property comes under active possum management by Council contractors (or OSPRI), the occupier remains responsible. Note that this applies only in designated Possum Control Areas. There is no obligation for landowners to control possums outside those areas.

Monitoring

The Council intends to initiate additional monitoring during the transition period to identify any land occupiers who have not undertaken effective possum control. This will allow the Council to ensure that those landowners who have not adhered to the requirements of the RPMP undertake additional possum control at their own cost prior to any Council-managed, large-scale contracting being implemented. This will also avoid "free-riding" and help keep contractor costs down.

Other measures?

Consideration has been given to other measures that may be reasonable to achieve the objectives related to the management of possums. Possums are designated a "sustained control" pest. They are widespread through most of the region, so effective coordination of control is a key aim of the programme. Long-term management or eradication in targeted areas is the most appropriate form of management to ensure their impacts on economic, environmental or social/cultural/amenity values are cost-effectively reduced. The Council has concluded

that there are no other measures available that would achieve the objectives of the programme.

Voluntary action?

The Council does not believe that voluntary action to manage possums is adequate to achieve the objectives. Voluntary pest management is by its nature inconsistent. Some landowners will do an excellent job of controlling pests over the long term, while others will control them only sporadically or not at all. HBRC has found this to be true under the current PCA programme.

Achieving the outcomes sought from possum control, particularly improvements to biodiversity, requires reliable, long term, consistent control. The Council believes that a contractor-based, regionally coordinated possum control programme will reduce uncertainty and be more cost effective than relying upon the voluntary actions of individuals.

RPMP amendments

The amendments proposed to the plan are outlined below and a full "track changes" document is provided online.

Forestry Operations

Under HBRC's current RPMP, production forestry is to some degree exempt from possum control rules. Forestry properties need to control possums to 5% Residual Trap Catch (not 4% RTC) and only in a 500-metre buffer from their boundary. Forestry also benefits from a capped targeted rate.

However, a review of the possum control area programme found considerable evidence that these exemptions complicate and compromise the efficiency and effectiveness of the entire programme. The Council believes that the current buffer approach for forestry can leave large areas in or adjacent to the PCA programme with high possum numbers, creating reinvasion problems and generally exacerbating the damage done to pasture, horticulture and biodiversity.

Under this proposal, production forestry operations would be included in the contractor-delivered possum control programme. Fundamentally, forestry would be treated the same as any other primary production land. The transition to a contractor-based model would occur over a period of four to five years beginning in 2024. While that transition is occurring, forestry's existing responsibilities would remain in effect.

⁶The remainder is largely public conservation land managed by the Department of Conservation.

Objective 11

Over the duration of the Plan, sustainably control possums contained in Possum Control Areas to ensure population density on that land is at or below 4% residual trap catch with no more than three possums in a single monitoring line, to minimise adverse effects on environmental values and economic wellbeing in the Hawke's Bay region.

Principal measures to be used

Appropriate measures drawing on requirement to act, council inspection, service delivery, advocacy and education activities described in section 5.3 of the Plan will be used to achieve the Objective.

Plan Rule 14

An occupier in a Possum Control Area shall maintain possum densities on their land at or below 4% residual trap catch with no more than three possums in a single monitoring line, in accordance with the Hawke's Bay Regional Possum Control Technical Protocol (PN 4969). This rule does not apply if the property is under active possum management by the Hawke's Bay Regional Council or OSPRI.

Explanation of rule

The reason for this rule is to protect past investment in possum control by ensuring possum population levels remain below the threshold at which economic wellbeing and environmental values are threatened. The Council believes that requiring no more than three possums per monitoring line is an effective way of measuring the effectiveness of possum control efforts.

The Council is moving from an occupier responsibility model to council contractor delivery of possum control. This will take time to implement. Occupiers will continue to be responsible for possum control in the interim. However, once possums are being actively managed by Hawke's Bay Regional Council the rule will no longer apply to occupiers. Further, the rule will not apply to any occupier who remains within a TB Management Area where possums are being actively managed by OSPRI.

Sections 52 and 53 of the Biosecurity Act 1993, which prevent the communication, release, spread, sale and propagation of pests, must be complied with. These sections should be referred to in full in the Biosecurity Act 1993. A breach of these rules creates an offence under section 154(O) of the Act.

Plan Rule 15

Note: This is designated a Good Neighbour Rule. Except where an occupier of land has entered into a Written Management Agreement approved by Hawke's Bay Regional Council, an occupier in, or adjacent to, a Possum Control Area, shall, on receipt of a written direction from an Authorised Person maintain possum densities on their land at or below 5% residual trap catch with no more than three possums in a single monitoring line in 500 metres of the adjoining property boundary where the occupier of the adjoining property is also maintaining possum densities on their land at or below 5% residual trap catch. This rule will not apply to any occupier where possums are being actively managed by HBRC or OSPRI at or below 4% residual trap catch.

Relation of the proposal to Possum Eradication Areas

This proposal makes no changes to the objectives and rules associated with locations identified as Possum Eradication Areas.

Possum Control Technical Protocol PN 4969

This Regional Possum Control Protocol sets out areas that are Possum Control Areas and Possum Eradication Areas and the requirements to meet the programme rules in the Hawke's Bay Regional Pest Management Plan 2018-2038. These rules apply to all Possum Control Areas and Possum Eradication Areas identified in this document. This Technical Protocol is incorporated by reference into the Hawke's Bay Regional Pest Management Plan .

PCA exemptions and subsidies

Exemptions to possum control may be sought under S. 87 of the Biosecurity Act 1993.

The subsidy schemes associated with the PCA programme will be phased out as large-scale contracting is implemented across PCAs.

Responsibilities and Obligations

HBRC remains the management agency responsible for implementing the RPMP, which was established in 2019 and is in effect until 2039 .

The proposed amendments make no change to the responsibilities of any other agencies .

Monitoring

The current RPMP requires properties to maintain possums at or below 4% RTC when all the monitoring lines on the property are averaged . This has the effect of making it easier for large properties, which will have more monitoring lines, to pass a monitor even if they have high possum numbers in one area. For example, a large PCA property might require 10 monitoring lines. If nine of those lines return a low RTC of 2% but one line detects a quite high RTC of 20%, the property still passes with an average RTC of 3.8%. A smaller property with five lines can have four at 2% and one at 20% and fail with an average RTC of 5.6%.

This proposal would retain the 4% RTC requirement, but change the monitoring requirement to no line over three possums. We believe this will improve equity between large and small properties, as well as creating greater consistency of control.

Powers in Part 6 of the Act

The powers noted in Table 8.1 of the RPMP are not affected by the proposed amendments .

Cost Benefit Analysis

The Biosecurity Act requires that funding for pest management be thoroughly examined. For a proposal, this includes:

- analysing the costs and benefits of the plan and any reasonable alternative measures
- noting how much any person will likely benefit from the plan
- noting how any person's actions or inactions may contribute to creating, continuing or making worse the problems that the plan proposes to resolve
- noting the reason for allocating costs; and
- noting whether any unusual administrative problems or costs are expected in recovering the costs from any person who is required to pay.

The cost benefit analysis (CBA) for this proposal has been updated from the work undertaken in 2017-18 for the RPMP. The full CBA report is included online.

The CBA indicates that the total benefit of the PCA programme is around \$51 million, with annual costs

of approximately \$3.5 million under the proposed contractor-based model. The net benefit using discounted cashflow analysis is \$21 million over a ten-year period.

It is important to note that the CBA is based on an indicative possum control cost of \$12/ha per annum for the first year and \$7/ha per annum for subsequent years. HBRC's approved possum contractors have indicated that the initial cost of control to transition to HBRC-managed contracts would be between \$8-12 per hectare. Subsequent years of maintenance control would be in the range of \$6-9/ha. The figures used in the CBA are therefore appropriately conservative.

The CBA report concluded:

"The ten-year CBA estimates that the programme is likely to save the region about \$15 million over the next decade. The 50-year projection suggests a benefit of \$77 million, which is both considerable and is likely to be an under-estimate as it is likely that possum control technologies will become much more effective and less costly over this period. This is a possibility that we conservatively omit from our modelling, instead projecting forward the costings and effectiveness of current possum control.

It is ... important that possum densities and impacts continue to be monitored in the region, so that the programme can be regularly reviewed and, if necessary, reassessed. With the current information available, we conclude that council-led control of possums is prudent and justified."



Funding Analysis

The Biosecurity Act 1993 and the Local Government (Rating) Act 2002 require that funding is sought from:

- people who have an interest in the plan
- those who benefit from the plan
- those who contribute to the pest problem.

Funding must be sought in a way that reflects economic efficiency and equity. Efficiency includes close targeting of costs to benefits and to those contributing to the problem (exacerbators). Equity is difficult to establish, particularly for a 'public good' such as biodiversity protection and restoration. Equity is a judgement decision that must be made by the Council. In general, however, the Council views biodiversity, which is the primary driver of the proposal to revise the possum control programme, as a region-wide 'public good', ie, the benefits are not specific to one segment of society.

For the past 20 years, possum control has been funded by HBRC on the basis that the primary benefits have been to farming, to reduce possum impact on pastoral production and reduce the risk of bovine TB. Under the current structure, 70% of costs are assessed on owners of productive land who benefit directly from low possum densities and increased productivity.

It is important to recognise, however, that in practice OSPRI Ltd have responsibility for the National bovine TB strategy, which is levy-funded by farmers to eliminate TB from New Zealand. While coordination between HBRC and OSPRI is important, and mutually beneficial, the principal outcomes HBRC seeks to deliver from possum control are biodiversity related.

The Council considers, therefore, that overall, the beneficiaries of the biosecurity activity are spread across the region, rather than being primarily linked to rural areas. As a result, the current funding split will need to change to reflect this. The cost allocation implications of this will be further considered as part of the review of the Council's Revenue and Financing Policy, scheduled for 2023.

Proposed allocation of costs

The existing funding split for this programme is 70% targeted rate, 30% general rate. Given the primary driver of this programme is biodiversity, it is proposed that the funding split is substantially changed to account for this. It is proposed that the programme be primarily funded by a general rate with a smaller percentage of targeted rate to reflect the greater proportion of biodiversity benefits than production benefits. No Council decisions on new PCA budgets or any revised allocation of costs have been made. These issues will be considered and discussed with the community as part of the 2024 Long Term Plan (LTP). The changes envisioned in this proposal are enabling, but would not be enacted until the LTP and the Revenue and Financing Policy have been reviewed.

Until any changes to the PCA programme are implemented, revenue sources and the allocation of costs will remain unchanged from the current RPMP.



**Tukua mai ō
whakaaro**

**Have
your say**

*The easiest way is
online at hbrc.govt.nz*




HAWKES BAY
REGIONAL COUNCIL
TE KAUNIHERA Ā-ROHE O TE MATAU-A-MĀUI



There are a number of ways to share your views with us on this proposal.
Please read the consultation document before having your say. Thanks for taking the time to get involved.

First name: Last name:

Email:

Address:

If you are submitting as the official spokesperson on behalf of an organisation, please give the
organisation name here:

Constituency: Ahuriri-Napier Heretaunga-Hastings Ngaruroro
 Tamatea-Central Hawke's Bay Wairoa not sure out of region

Are you a Hawke's Bay ratepayer? Yes No

Which option do you support?

Do you support moving to a contractor delivery model for possum control?

Yes No Don't know

Please give your reasons below (optional)

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.....
.....

Need more room? You can attach extra pages, just make sure they include your name and address.

Do you wish to present your submission to the Regional Council at a hearing on 17 August?

Yes No If yes, please provide a daytime contact number and/or email address

.....

Privacy Statement - Submissions are public information. Your name and feedback will be included in public documents as part of the decision-making process. All other personal details will remain private. This information will be held by Hawke's Bay Regional Council but only for the purpose of this consultation process.

One submission per individual.

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HBRC must receive your submission by 8pm on Sunday 31 July 2022